

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Renee Curtis-Carey a/k/a Renee Curtis  
Debtor,

PHH Mortgage Corporation as servicer for  
Deutsche Bank National Trust Company, as  
Trustee for Morgan Stanley Dean Witter  
Capital I Inc. Trust 2003-NC2, Mortgage Pass-  
Through Certificates, Series 2003-NC2  
Movant.

v.

Renee Curtis-Carey a/k/a Renee Curtis  
Debtor/Respondent,

Scott Waterman, Trustee  
Additional Respondent.

BANKRUPTCY CASE NUMBER  
16-17392-amc

CHAPTER 13

**RESPONSE OF PHH MORTGAGE CORPORATION AS SERVICER FOR DEUTSCHE  
BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR MORGAN STANLEY  
DEAN WITTER CAPITAL I INC. TRUST 2003-NC2, MORTGAGE PASS-THROUGH  
CERTIFICATES, SERIES 2003-NC2 TO DEBTOR'S MOTION FOR  
DETERMINATION OF FINAL CURE AND PAYMENT OF ALL POST-PETITION  
MORTGAGE PAYMENTS**

PHH Mortgage Corporation as servicer for Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC2, Mortgage Pass-Through Certificates, Series 2003-NC2, by and through its counsel, LOGS Legal Group LLP, hereby responds to Debtor's Motion for Determination of Final Cure and Payment of all Post-Petition Mortgage Payments, and in support thereof, avers as follows:

1.-10 . Admitted.

11. Denied. Respondent reserves the right to supplement and amend this response based on further review.

12. Denied as a conclusion of law. Respondent reserves the right to supplement and amend this response based on further review.

13. Denied as a conclusion of law. Respondent reserves the right to supplement and amend this response based on further review.

14. Denied as a conclusion of law. Respondent reserves the right to supplement and amend this response based on further review.

15. The document speak for itself, no response required.

16. Admitted. It is further noted no formal objection to said Notice was ever filed by the Debtor.

17. Denied as a conclusion of law. Respondent reserves the right to supplement and amend this response based on further review.

18. Denied as a conclusion of law. Respondent reserves the right to supplement and amend this response based on further review.

19. Admitted. Respondent reserves the right to supplement and amend this response based on further review.

20. Denied that the fees are not recoverable under the mortgage; undersigned counsel was not the attorney of record who filed the PPFN so she will review the recoverability issue with her client and supplement and amend this response based on further review.

21. Denied as a conclusion of Law . Also denied that this is the proper procedural posture to challenge a Post -petition fee notice filed in 2017; Respondent's fee notice should have been objected to timely and with a properly captioned objection to the Fee Notice. Respondent reserves the right to supplement and amend this response based on further review.

22. Denied as a conclusion of law. Respondent reserves the right to supplement and amend this response based on further review.

WHEREFORE, PHH Mortgage Corporation as servicer for Deutsche Bank National Trust Company, as Trustee for Morgan Stanley Dean Witter Capital I Inc. Trust 2003-NC2, Mortgage Pass-Through Certificates, Series 2003-NC2 respectfully requests that confirmation of the Debtor's Motion for Determination of Final Cure and Payment of all Post-Petition Mortgage Payments be dismissed/denied.

/s/ Kristen D. Little

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Christopher A. DeNardo 78447  
Kristen D. Little 79992  
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King of Prussia, PA 19406  
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**CERTIFICATE OF SERVICE**

I, Kristen D. Little , an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of the foregoing by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this September 10, 2021:

Renee Curtis-Carey a/k/a Renee Curtis  
7827 Temple Road  
Philadelphia, PA 19150

Alfonso G. Madrid, Esquire, Community Legal Services of Philadelphia  
North Philadelphia Law Center  
1410 W. Erie Avenue  
Philadelphia, PA 19140  
amadrid@clsphila.org - VIA ECF

Scott Waterman, Trustee  
Chapter 13 Trustee  
2901 St. Lawrence Avenue, Suite 100  
Reading, PA 19606  
ecfmail@reecadingch13.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Kristen D. Little  
Christopher A. DeNardo 78447  
Kristen D. Little 79992  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2021, upon  
consideration of the Debtor's Motion for Determination of Final Cure and Payment of all Post-  
Petition Mortgage Payments and Respondent's response thereto;

It is hereby ORDERED that Debtor's Motion for Determination of Final Cure and  
Payment of all Post-Petition Mortgage Payments is DENIED.

BY THE COURT:

\_\_\_\_\_  
HONORABLE ASHELY M. CHAN  
UNITED STATES BANKRUPTCY JUDGE